

April 7, 2017

Peggy Price, Director
Imperial County Department of Social Services
2995 S. Fourth St., #105
El Centro, CA 92243

Dear Ms. Price:

This letter is to advise you that the Corrective Action Plan submitted by Imperial County on November 21, 2016 in response to the results of our 2016 Civil Rights Compliance Review is approved.

We will be monitoring the implementation of your corrective action items through your Civil Rights Coordinator.

If you have any questions, please contact Daniel Cervantes at (916) 654-2107. You may also contact your consultant by e-mail at Daniel.Cervantes@dss.ca.gov.

Sincerely,

Original signed by Tiffany Marsh

TIFFANY MARSH, Acting Chief
Civil Rights Unit
Welfare to Work Division

c: Charlie Cruz, Civil Rights Coordinator

Kim McCoy Wade, Chief
CalFresh Policy Bureau

Carlos Ocampo, Chief
Field Operations Bureau

Tami Gutierrez, Chief
CalFresh Management Operations Section

Paul Gardes
CalFresh Policy Bureau

Jacqueline Hom
State Refugee Coordinator

Joe Torres, Office of Civil Rights
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Andrew Riesenbergl
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
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Kevin Aslanian
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier
Western Center on Law and Poverty

PEGGY PRICE
DIRECTOR



2995 SOUTH 4TH STREET
EL CENTRO, CA 92243
TELEPHONE: (760) 337-6800

November 21, 2016

Jim Tashima, Chief
Civil Rights Unit
Welfare to Work Division

Dear Mr. Tashima:

I want to thank you for giving us the opportunity to correct deficiencies that were noted during the Civil Rights Compliance Review of May and June 2016.

Our department strives to provide the appropriate accommodations and optimum service to each and every person who visits our offices. We don't do this only because of State regulation but because it is the right thing to do. Even though we are diligent in our efforts to comply with Civil Rights regulations we welcome any assistance that will aid us accomplishing this goal.

We regard the Civil Rights Compliance Review as a means for us to have an outside entity observe our current procedures and facilities to ensure that we are in fact compliant and providing the best service and accommodations for the population we serve. The reviewer, Mr. Daniel Cervantes, was very well versed in Civil Rights regulations and was very informative when asked questions regarding policy/procedures and facility criteria.

We consider the attached Imperial County Department of Social Services 2016 Corrective Action Plan a blueprint for ensuring not only compliance with Civil Rights but a way for our department to attain our goal of providing the best service possible for our clients.

Sincerely,

A handwritten signature in black ink, appearing to read "Charlie Cruz", written over a horizontal line.

Charlie Cruz
Assistant Director

IMPERIAL COUNTY CIVIL RIGHTS CORRECTIVE ACTION PLAN 2016

The County of Imperial Social Services Department submits to the State of California, Department of Social Services, the following Corrective Action Plan in response to the 2016 Audit of the Imperial County Civil Rights Program:

III. DISSEMINATION OF INFORMATION

B. Corrective Actions

Informational Element

Posters:

Corrective Action Required

Imperial County Department of Social Services shall ensure that the most current version of posters on non-discrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms. Div. 21-107.211

All offices staffed by employees of the Imperial County of Social Services were provided with the most current version of posters and documents. In addition, these posters and documents will be reviewed annually to ensure they are current.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

A. Findings and Corrective Actions

1. Facility Location: 860 Main Street, Brawley, CA

Facility Element

Parking:

Findings

No authorized Parking Sign at either parking parking lot entrance.

Corrective Action

An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8.1)

pg. 170

The additional sign shall not be less than 17" wide x 22" high. Fig 4 (CA T24 11B-502.8.1) pg. 170

The Imperial County Department of Social Services has communicated with the County department overseeing facilities for the County of Imperial and the additional signs will be placed accordingly and visible to all who enter the parking lot of this site. These signs will be placed no later than January of 2017.

The words NO PARKING not in access aisle.

The words “NO PARKING” shall be painted on the surface of each accessible painted aisle. (CA T24 11B-502.3.3) pg. 176

This notice shall be painted in white letters a min. of 12” in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3) pg. 176

The Imperial County Department of Social Services has communicated with the County department overseeing facilities for the County of Imperial and the access aisle will be painted with the words, “NO PARKING” and in accordance to the correct height and visible to all who enter the parking lot of this site. These words will be painted no later than January of 2017.

Exterior entrance:

No ADA signage at building entrance indicating building is ADA accessible,

In existing buildings and facilities where not all entrances comply with Section 33, Doors, Doorways and Gates entrances complying with Section 33, Doors, Doorways and Gates shall be Identified by the international Symbol of Accessibility complying with “International Symbol of Accessibility” Heading in Section 57, Signs & Identification. (CA T24 11B-216.6) (ADA 216.6) pg. 28

The Imperial County Department of Social Services has communicated with the County department overseeing facilities for the County of Imperial and the signage indicating the building is ADA accessible will be installed at this site. In addition, the International Symbol of Accessibility will be placed on all doors, doorways and gates designated for those individuals who require ADA compliant entrances in accordance with regulation. These signs will be placed in their appropriate locations no later than January of 2017.

First set of double doors at building’s entrance too heavy at 12 pounds.

The force for pushing or pulling open a door or gate other than fire doors shall be as follows:

Second set of double doors at building’s entrance too heavy at 13 lbs.

1. Interior hinged doors and gates: 5 lbs max.
2. Sliding or folding doors: 5 lbs max.
3. Required fire doors,: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1-4)) (ADA 404.2.9 (1-2)) pg. 319

The Imperial County Department of Social Services has communicated with the County department overseeing facilities for the County of Imperial and both sets of double doors at this site will be adjusted to their proper opening force in pounds in accordance with regulation. These doors will be adjusted no later than January of 2017.

Restrooms:

Men's:

Soap dispenser too
High at 52 inches.

Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route.
(CA T24 11B-603.5) pg. 319

Women's:

Soap dispenser too
High at 52 inches.

All operable parts, including coin slots, Shall be 40" max. above the finish floor.
(CA T24 11B-603.5) pg. 319

The Imperial County Department of Social Services has communicated with the County department overseeing facilities for the County of Imperial and the soap dispensers in both the men's and women's restroom at this site will have at least one of each type of dispenser adjusted to the correct height of 40" in accordance with regulation. These adjustments will occur no later than January of 2017.

V. PROVISIONS FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH SPEAKING OR WHO HAVE DISABILITIES.

B. Findings and Corrective Actions:

Area of Findings

Corrective Actions

Effective Services:

Imperial County Department of Social Services must develop and implement a policy that identifies the process to ensure effective services to applicants and recipients who are non-English speaking or who have disabilities. Div. 21-115

Imperial County Department of Social Services has developed a form to determine the type of disability and recommended accommodations, which will be given to all persons coming in to our offices who claim to have a disability and require assistance. In addition, a "Language Designation" and "Interpretive Services" forms were developed to address language barriers and how to accommodate that population.

Training for these new forms and their procedures will be provided to all current Imperial County Department of Social Services staff beginning in January 2017 and will continue until all Imperial County Department of Social Services staff have been trained. This training will also be provided each year thereafter in conjunction with the annual Div 21 Civil Rights

training. In addition, this training will be provided to all new hires to the Department as part of their initial indoctrination.

Timely Services:

Imperial County Department of Social Services must ensure that bilingual/interpretive services are prompt and without undue delay. Div. 21-115

Training on how to access and how to use the “Language Line” will be provided to all current Imperial County Department of Social Services staff beginning in January 2017 and will continue until all Imperial County Department of Social Services staff have been trained. This training will also be provided each year thereafter in conjunction with the annual Div 21 Civil Rights training. In addition, this training will be provided to all new hires to the Department as part of their initial indoctrination.

Interpreter Service:

Imperial County Department of Social Services must offer and provide free interpreter services using qualified interpreters. Div. 21-104q(1) and 21-115

Imperial County Department of Social Services has developed an Interpreter Service Statement to assist in informing clients, with a primary language other than English, of the availability of free interpreter service. All Imperial County Department of Social Services staff will be provided training on this new form during the annual Div 21 Civil Rights training. Newly hired employees will receive this training during their initial indoctrination. All Imperial County Department of Social Services staff who will be interpreting Spanish are certified in the Spanish language. All other languages will be interpreted using the “Language Line”.

Written Materials:

Imperial County Department of Social Services must use and provide translated forms, to include translated Notices of Action forms, in the clients primary languages when translated by CDSS. Div. 21-115.2

All Imperial County Department of Social Services staff will be trained in how to access available notices in the State’s website to accommodate the primary languages of the client. For those notices that are not available in the State’s website the staff will utilize the “freetranslation.org” website to create a “manual” Notice of Action written in the primary language of the client. All Imperial County Department of Social Services staff will be provided training on this new procedure during the annual Div 21 Civil Rights training. Newly hired employees will receive this training during their initial indoctrination.

Notices of Action:

When Imperial County Department of Social Services uses translated forms and materials, such as notices of actions that contain spaces in which the County must insert information for the client, such information must be in the primary language of the client. Div. 21-115.2

For those notices available at the State's website and require a manual insertion of information or direction, or for those notices that are not available in the State's website and the notice has to be generated in the client's primary language the information will be translated using the "freetranslation.org" website. All Imperial County Department of Social Services staff will be provided training on this new procedure during the annual Div 21 Civil Rights training. Newly hired employees will receive this training during their initial indoctrination.

Auxiliary Aids:

Imperial County Department of Social Services shall ensure the availability of auxiliary aids and services to persons who are deaf or hearing impaired, or persons with impaired speech, vision or manual skills where necessary to afford such persons an equal opportunity to access program services. Div 21-115.41

Each office within the Imperial County Department of Social Services has been assessed to determine the need for auxiliary aids. Auxiliary aids will be provided for those offices within the Imperial County Department of Social Services which do not have these apparatus. With the purchase of these apparatus our offices will be able to assist this population to ensure they have an equal opportunity to access program services within ICDSS.

Learning Disability Screening:

Imperial County Department of Social Services must have a protocol in place for screening and evaluating participants in the CalWORKs WtW program with learning disability by trained staff.
ACL No. 01-70 (02-64)

ACL 01-70 allows counties to utilize other recognized and validated learning disability screening tools, as long as staff is properly trained to administer them. A copy of the selected tool must be provided to CDSS. Imperial County has a large Spanish speaking population; it would be beneficial to the Department and our customers to seek other avenues that would allow proper screening for Non-English customers.

WTW will research for a recognized and validated screening tool to use for the Non-English speaking population

WTW will train staff on the administration of the English and Spanish Learning Disability Tools, which includes procedures and how and where to refer customers based on their score.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

C. Corrective Actions

Areas of Action

Corrective Action

Documentation if client provided own interpreter

When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div 21-116.23

Imperial County Department of Social Services has developed a form (Interpreter Services Statement) which informs the applicants/recipients of availability of interpretive services as well as explains the potential problems that may arise if they use their own interpreter. These forms will be available in each office of the Imperial County Department of Social Services. The applicants/recipients will be read or will read the form on their own. Once they make a decision to either use the Department's interpretive services or use their own they will sign and date the form. This form will be scanned and indexed into their case in the C-IV program. In addition, the offer to provide interpretive services and their decision will be documented in the journal within their case in C-IV. For those programs who utilize CWS/CMS or CMIPS these forms will be filed in the appropriate case and documented in the case as well.

Documentation of interpreter signed Confidentiality Statement

Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div 21-116.24

Imperial County Department of Social Services has developed a form (Interpreter Services Statement), which when indicated and signed by the client, allows someone of their choosing to interpret for them. The potential problems, which may arise from using someone other than certified interpreters from Imperial County Department of Social Services, are also outlined in this form. These forms will be available in each office of the Imperial County Department of Social Services. The applicants/recipients will be read or will read the form on their own. Once they make a decision to either use the Department's interpretive services or use their own they will sign and date the form. This form will be scanned and indexed into their case in the C-IV program. In addition, the offer to provide interpretive services and their decision will be documented in the journal within their case in C-IV. For those programs who utilize CWS/CMS or CMIPS these forms will be filed in the appropriate case and documented in the case as well.

**Documentation of
Primary Language**

Each agency shall ensure that case record identification shows the applicant's/recipient's ethnic origin, and primary language. Div 21-201.21

Imperial County Department of Social Services has developed a form (Language Designation Form), which allows the applicants/recipients the opportunity to select from (7) designated languages and the option to write in one that is not listed on the form. Once a language is selected the applicants/recipients will sign the form. The case carrying worker will then sign and date the form indicating that the language selected has been entered in one of the many computer systems the Imperial County Department of Social Services uses and depending on the program. These forms will be available in each office of the Imperial County Department of Social Services. The applicants/recipients will be read or will read the form on their own. This form will be scanned and indexed into their case in the C-IV program or documented in CWS/CMS or CMIPS.

**Documentation that
bilingual services
were provided.**

Document the method used to provide bilingual services, e.g. assigned worker is bilingual, other Bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22

With the Language Designation Form completed by the applicants/recipients the primary language of the client will be known to the system. Currently all cases are assigned to an appropriate worker based on the primary language of the client. Imperial County Department of Social Services staff will be instructed to document any information regarding: the primary language requested for verbal interview; the primary language requested for written documents; if a certified bilingual staff was assigned to the case and/or was used to interpret; or if client provided an interpreter.

General

Imperial County Department of Social Services must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

Imperial County Department of Social Services will ensure that proper documentation will be kept in the file by scanning and indexing all documents in the C-IV system for all cases related to that system and all other documents will be filed in the appropriate case in CWS/CMS and CMIPS.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

B. Corrective Action

<u>Element</u>	<u>Corrective Action</u>
<u>Discrimination Process</u>	Imperial County Department of Social Services shall ensure staff has knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-103 <i>Imperial County Department of Social Services will provide training in Div 21 Civil Rights Regulations beginning January 2017. This training will include all aspects of Civil Rights including being able to differentiate a complaint of discrimination from other complaint processes. This training will be provided on a scheduled annual basis and will also be provided to newly hired employees as part of their initial indoctrination.</i>